

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

Jane Does 1-9,

Plaintiffs,

vs.

Collins Murphy, Limestone College, MG
Freesites, LTD., d/b/a Pornhub.com, and Hammy
Media LTD. d/b/a Xhamster.com,

Defendants.

Case No.: 7:20-cv-00947

**Motion
in Support of
Pro Hac Vice Application**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that **Valentin D. Gurvits** be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).

☐ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; ☒ does not intend to oppose

☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):

☐ No duty of consultation is required because the opposing party is proceeding pro se.

Metcalfe & Atkinson, LLC
Firm Name
1395 S. Church Street

Hannah Rogers Metcalfe
Name of Local Counsel
s/ Hannah Rogers Metcalfe

Street Address or Post Office Box

Greenville, SC 29605

City, State, Zip Code

843-577-4435

Telephone Number

hmetcalfe@malawfirm.com

E-Mail Address

Signature of Local Counsel

Local Counsel for Hammy Media, LTD

District of South Carolina

Federal Bar Number 9943